

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO  
and KARL LEIBINGER, on behalf of  
themselves and those similarly situated,

Plaintiffs,

v.

DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., SA),

Defendants.

Civil Action No.: 03-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware  
Corporation, STONINGTON CAPITAL  
APPRECIATION 1994 FUND L.P., a Delaware  
Partnership and STONINGTON HOLDINGS,  
L.L.C., a Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., SA),

Defendants.

Civil Action No.: 04-10411 (PBS)

GARY B. FILLER and LAWRENCE  
PERLMAN, Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., SA),

Defendants.

Civil Action No.: 04-10477 (PBS)

JANET BAKER and JAMES BAKER,  
JKBAKER LLC and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., SA),

Defendants.

Civil Action No.: 04-10501 (PBS)

**DEXIA BANK BELGIUM'S MOTION TO COMPEL PRODUCTION OF CERTAIN  
"ISSUE LISTS" WITHHELD AS WORK PRODUCT**

Defendant Dexia Bank Belgium, by and through its counsel, hereby moves to compel the production of certain "Issue Lists" withheld as work product.

In support of this motion, Dexia Bank Belgium submits the accompanying Memorandum of Law and the Declaration of Jeff E. Butler.

WHEREFORE, Dexia Bank Belgium requests that this motion to compel production be granted in full.

**REQUEST FOR ORAL ARGUMENT**

In accordance with Local Rule 7.1(D), Dexia Bank Belgium requests oral argument on this motion.

**CERTIFICATION**

The undersigned counsel hereby certifies, pursuant to Local Rule 7.1(A)(2), that counsel for Dexia Bank Belgium and counsel for all Plaintiffs conferred in good faith regarding the production of the "Issue Lists," but were unable to reach agreement.

Dated: August 11, 2006

Respectfully submitted,

MINTZ LEVIN COHN FERRIS GLOVSKY &  
POPEO

By: /s/ Breton Leone-Quick  
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*Counsel for Dexia Bank Belgium*

**Certificate of Service**

I, Breton Leone-Quick, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on August 11, 2006.

/s/ Breton Leone-Quick

Dated: August 11, 2006